Mr. Scott Stoner
Bridgeport Brass d/b/a Olin Brass, Indianapolis
1800 South Holt Road
P.O. Box 51519
Indianapolis, Indiana 46241-4505

Re: 097-12774-00005
Second Administrative Amendment to
Part 70 097-6211-00005

Dear Mr. Stoner:

Bridgeport Brass d/b/a Olin Brass, Indianapolis was issued its initial Part 70 operating permit, T097-6211-00005, on December 29, 1998 for a secondary brass production operation located at 1800 South Holt Road in Indianapolis, Indiana. A First Administrative Amendment, 097-11196-00005, to reflect requested changes as part of Olin Brass' January 25, 1999 appeal letter to IDEM, OAM and to reflect the shut down of the Rod, Wire and Tube Operations was issued on August 30, 1999.

A letter requesting an amendment to Section D.2.7 and Section D.3.6(b) was received by ERMD on August 30, 2000. The First Administrative Amendment inadvertently did not address the negotiated Section D.2.7 change to monitor the pressure drop across each compartment of the three baghouses. As a result, this Second Administrative Amendment revises Section D.2.7 to state the negotiated pressure drop monitoring change. Section D.3.6(b) stated that the "Permittee shall maintain records of the kiln and afterburner temperature." There is no regulatory requirement to monitor the kiln temperature and Olin Brass specifically requests that this condition be deleted from the Title V Permit.

The August 30, 2000 amendment request letter also informed ERMD that Inductotherm units 38, 39 and 40 were being returned to service and that the final product will be single bar(s) instead of twelve rods. These emission units were incorporated in the initial Part 70 Permit. The final product is not part of the facility description and Olin Brass has stated that there will be no increase in potential to emit. As a result, no amendment to the facility description, Section D.2.2 or Section D.2.10 is requested or required at this time.

Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (additions appear in bold, deletions in strikeout):

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across each **compartment** of the three baghouses used in conjunction with emissions units 4, 5 and 6, at least once daily when the furnaces are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the three baghouses shall be maintained within the range of 0.5 to 6.1 inches of water or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and ERMD and shall be calibrated at least once every six (6) months.

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the emission unit 7 stack exhaust.

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the ~~kiln and~~ afterburner temperature.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Mark Caraher, at (317) 327-2272.

Sincerely,

Mona A. Salem
Chief Operating Officer
Department of Public Works
City of Indianapolis

Attachment - Second Administrative Amendment
cc: files
U.S. EPA, Region V
Mindy Hahn, IDEM OAM

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Bridgeport Brass d/b/a Olin Brass
1800 S. Holt Road
Indianapolis, Indiana 46241

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-6211-00005	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date: December 29, 1998

First Administrative Amendment: T097-11196	Affected Pages: 6, 7, 8, 35, 36, 37, 40, 41, 42, 43, 44
Issued by: Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date: August 30, 1999

Second Administrative Amendment: T097-12774	Affected Pages: 36 and 39
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date:

PM testing on emission unit 4 is deferred until that unit is in operation. The Permittee shall notify IDEM and ERMD at the time emission unit 4 is returned to service and shall perform PM testing utilizing Method 5 or 17 (40 CFR 60, Appendix B), or other methods as approved by the Commissioner, within 90 days of the date the unit is returned to service. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM or ERMD may require compliance testing when necessary to determine if these emission units are in compliance.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhausts for emission units 4, 5 and 6 shall be performed during normal daylight operations when the process is in operation. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across each compartment of the three baghouses used in conjunction with emissions units 4, 5 and 6, at least once daily when the furnaces are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the three baghouses shall be maintained within the range of 0.5 to 6.1 inches of water or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and ERMD and shall be calibrated at least once every six (6) months.

D.2.8 Broken Bag Detection

In the event that bag failure has been observed:

(a) In the event of a bag failure that causes the Permittee to operate outside the parameters in the permit for pressure drop or to emit visible emissions, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the

emissions from emission unit 7 on a continuous basis. The temperatures shall be recorded on a strip chart recorder. The afterburner shall be shall be maintained at a temperature greater than 200 degrees Celsius (392 degrees Fahrenheit) when the process is in operation or a range established during the latest stack test. The Compliance Response Plan (CRP) for this unit shall contain troubleshooting contingency and response steps for when the temperature reading falls below the minimum operating temperature for any one reading.

The instrument used for determining the temperature shall be subject to approval by IDEM, OAM, and ERMD and shall be maintained according vendor specifications.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the emission unit 7 stack exhaust.

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the afterburner temperature.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.